



STATE OF DELAWARE  
EXECUTIVE DEPARTMENT  
OFFICE OF  
STATE PLANNING COORDINATION

August 11, 2004

Mr. Lawrence T. Whitlock  
Lawrence T. Whitlock & Associates, Inc.  
P.O. Box 1100  
Berlin, MD 21811

RE: PLUS review – PLUS 2004-07-06; Isaac Farm

Dear Mr. Whitlock:

Thank you for meeting with State agency planners on July 28, 2004 to discuss the proposed plans for Isaac Farm project to be located on U.S. Route 113 & Edwards Extension in Georgetown.

According to the information received, you are seeking a rezoning from AG1 to UR-1, HC, & MR-1 for the purpose of developing mixed use subdivision consisting of 332 residential units and 171,590 sq. ft. of commercial.

Please note that changes to the plan, other than those suggested in this letter, could result in additional comments from the State. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting. The developers will also need to comply with any Federal, State and local regulations regarding this property. We also note that as The Town of Georgetown is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the Town.

This office has received the following comments from State agencies:

**Office of State Planning Coordination – Contact: Ann Marie Townshend 739-3090**

The Office of State Planning notes that this project area is pending annexation into the Town of Georgetown. The Office is currently in the process of reviewing the Plan of Services for the annexation and has commented to the Town separately regarding the annexation.

The project is located mostly in Investment Levels 1 & 2, with a small (western-most) portion in Investment Level 3, according to the 2004 draft Strategies for State Policies and Spending. The Strategies document has been endorsed by the Cabinet Committee on State Planning Issues and is currently awaiting final approval by Governor Minner. For Investment Levels 1 & 2, State policies support well-planned development in keeping with the character of the community.

The PLUS application did not indicate how many acres (or what percent of the site) will be devoted to open space, however, in the July 28<sup>th</sup> meeting it was stated that 17.76 acres would be in open space. Because a multi-family community is proposed, open space devoted to active recreation and amenities such as playgrounds and tot lots should be considered.

It is recommended that you use some of the concepts discussed in "Better Models for Development in Delaware." Specifically, the developer should consider better integration of the commercial and residential uses. We suggest attractive and inviting bicycle/pedestrian connections between the commercial and residential uses. Maybe bike racks could be provided at the commercial site.

Again, we note that this proposal is moving forward concurrently with a proposal for the adjacent Georgetown Commercial Project to the north. We recommend that the developers coordinate so that the projects might fit together cohesively and possibly connect

**State Historic Preservation Office (SHPO) – Contact: Anne McCleave 739-5685**

There is a high probability for archaeological sites within the property. According to the application, there will be a federal permit needed for this project. The federal agency issuing the permit must comply with Section 106 of the National Historic Preservation Act (36 CFR 800) and consider the effects the project will have on any historic resources.

**Department of Transportation – Contact: Bill Brockenbrough 760-2109**

As acknowledged on the PLUS form, the section of Route 113 where the site has frontage is subject to the Corridor Capacity Preservation Program. DelDOT recognizes that the site's Truitt Avenue access is not sufficient for a parcel of this size. However, the developer should be aware that their access on Route 113 will be subject to further review and DelDOT may not approve the access that is proposed.

The concept plan does not address the part of the property north of Edward Street, where the existing produce stand is located. It is recommended that the produce stand be shown on the plan unless there is a plan to redevelop that area as something else.

Presently, DelDOT is engaged in a US Route 113 North-South Study, which is developing alternative alignments for improving and/or bypassing that road. One of the

alternatives under consideration is to improve the existing road. The current concept for doing that would deny access along the southbound lanes, build new northbound lanes in the median and convert the existing northbound lanes into a service road. If DelDOT selects that alternative, this development would lose its Route 113 access. Some of the other alternatives would pass directly through the east portion of this property.

By the spring of 2005 DelDOT expects to determine which alternatives merit detailed study, and later that year they expect to select an alignment. Therefore it may be worthwhile for the applicant to continue the land development process. They and the Town, however, should be aware that DelDOT might need to acquire either their access rights along Route 113 or a significant portion of this property.

For more information on the US Route 113 North-South Study, the developer should contact the project manager for that study, Mr. Monroe Hite. He may be reached at (302) 760-2120.

Because Truitt Avenue is presently a residential street of some age, it is recommended that the Town require the developer to build or improve Truitt Avenue to meet Town standards not only within the limits of this project but all the way to Ennis Road (Sussex Road 519). If the Town also approves the proposed Georgetown Commercial annexation, it may be reasonable to have them share this expense with the developer of those lands.

DelDOT will require a traffic impact study for this project and it is recommended that the Town withhold plan approvals pending the completion of that study and our review of it. Your traffic engineer should contact Bill Brockenbrough as soon as possible to schedule a scoping meeting for that study. Because the development is situated between two seasonally congested intersections on Route 113, specifically the Delaware Route 404 and US Route 9 intersections, DelDOT will require that some of the traffic counts be done while schools are closed for the summer. Bill can be reached at (302) 760-2109.

The concept plan shows cul-de-sac streets to the south (Truitt Avenue) and west (Edward Street) for the continuation of the Town's street network. DelDOT recommends converting these cul-de-sacs to stub streets and offer two further comments.

Because Truitt Avenue intersects Ennis Road only about 150 feet from Route 113, it may be desirable to modify the site plan to keep the amount of traffic added to that intersection to a minimum. DelDOT will address this subject in more detail when we review the TIS.

The plan should include streets to allow for the future connection of Linden Avenue through the subject property when the lands between this project and the existing Linden Avenue are developed. A plan has been recorded for those lands and it does include a right-of-way for the extension of Linden Avenue most of the way through to this parcel.

Your engineer should contact the DelDOT Subdivision Manager for Sussex County, Mr. John Fiori, regarding our requirements with regard to the design of the site entrance. Mr. Fiori may be reached at (302) 760-2260.

**The Department of Natural Resources and Environmental Control – Contact: Kevin Coyle 739-3091**

### **Soils**

According to the recent soil survey update, the soils in the vicinity of the proposed construction are mapped as Klej, Hurlock, and Mullica. Klej is a transitional soil between uplands and wetlands that contains both hydric (indicative of wetlands) and non-hydric (upland) soil components. Hurlock is a poorly-drained wetland associated (hydric) soil that has severe limitations for development. Mullica is a very poorly-drained wetland associated (hydric) soil that has severe limitations for development. Approximately 70-80 percent of subject parcel contains wetland associated (hydric) soils.

The soils on this parcel also contain rapidly permeable sandy surface and subsurface horizons.

Such soils are conducive to nutrient leaching via groundwater or surface runoff into the surrounding watershed. In soils containing shallow water tables (of which most of this parcel contains), these impacts are greatly intensified.

### **Wetlands**

Statewide Wetland Mapping Project (SWMP) maps indicate the presence of an extensive area of palustrine forested wetlands located within the forested area in the western section of this property. These maps also indicate areas of farmed wetlands in the eastern portion of the property.

Because there is strong evidence that federally regulated wetlands exist on site, **a wetland delineation, in accordance with the methodology established by the Corps of Engineers Wetlands Delineation Manual, (Technical Report Y-87-1) should be conducted. Once complete, this delineation should be verified Corps of Engineers through the Jurisdictional Determination process.**

Impacts to Palustrine wetlands are regulated by the Army Corps of Engineers through Section 404 of the Clean Water Act. In addition, individual 404 permits and certain Nationwide Permits from the Army Corps of Engineers also require 401 Water Quality Certification from the DNREC Wetland and Subaqueous Land Section and Coastal Zone Federal Consistency Certification from the DNREC Division of Soil and Water Conservation, Delaware Coastal Programs Section. Each of these certifications represents a separate permitting process.

**To find out more about permitting requirements, the applicant is encouraged to attend a Joint Permit Process Meeting.** These meetings are held monthly and are attended by federal and state resource agencies responsible for wetland permitting. Contact Denise Rawding at (302) 739-4691 to schedule a meeting.

Site plans show significant impacts to the forested Palustrine wetland area as well as to areas of farmed wetlands on site. Impacts to wetlands should be avoided. Wetlands provide water quality benefits, attenuate flooding and provide important habitat for plants and wildlife.

Lots should be removed in their entirety from both the wetland and the forest surrounding it. Vegetated buffers of no less than 100 feet should be employed from the edge of any water body, including ditches. The developer should note that both DNREC and Army Corps of Engineers discourage allowing lot lines to contain wetlands to minimize potential cumulative impacts resulting from unauthorized and/or illegal activities and disturbances that can be caused by homeowners.

### **ERES Waters**

This project is located adjacent to receiving waters of Nanticoke River designated as waters having Exceptional Recreational or Ecological Significance (ERES). ERES waters are recognized as special assets of the State, and shall be protected and/ or restored, to the maximum extent practicable, to their natural condition. Provisions in Section 11.5 of Delaware's "Surface Water Quality Standards" (as amended August 11, 1999), specify that all designated ERES waters and receiving tributaries develop a "pollution control strategy" to reduce non-point sources of nutrient runoff through implementation of Best Management Practices (BMPs). Best Management Practices as defined in subsection 11.5(e) of this section, expressly authorizes the Department to provide standards for controlling the addition of pollutants and reducing them to the greatest degree practicable, or where attainable, a standard requiring no discharge of pollutants.

### **TMDLs**

With the adoption of Total Maximum Daily Loads (TMDLs) as a "nutrient-runoff-mitigation strategy" for reducing nutrients in the Nanticoke Watershed, reduction of nitrogen and phosphorus loading will be obligatory. A TMDL is the maximum level of pollution allowed for a given pollutant below which a "water quality limited water body" can assimilate and still meet water quality standards to the extent necessary to support use goals such as, swimming, fishing, drinking water and shell fish harvesting. In the Nanticoke Watershed, "target-rate-reductions" of 30 and 50 percent will be required for nitrogen and phosphorus, respectively.

Although TMDLs are authorized under federal code, states are charged with developing and implementing standards to support those desired use goals. The Jurisdictional

authority for attaining these use goals fall under the auspices of Section 11.5 of the State of Delaware's Surface Water Quality Standards (as amended August 11, 1999), and will be achieved via nutrient reductions referred to as "pollution control strategies."

**In order for the applicant to verify compliance with the TMDL mandate, a full nutrient accounting process known as a nutrient budget shall be required.** This nutrient budget shall assess and compare contemporary nutrient loading rates from current land use(s), with those projected for the changed land use(s). Under the current TMDL nutrient reduction criterion for the Nanticoke watershed, all lands bounded by said watershed must demonstrate nutrient reductions that meet or exceed those percentage reduction level(s) prescribed for the Nanticoke TMDL.

**It should also be noted that a significant portion of subject parcel) is forested. Forested lands have been consistently shown to be far more effective agents for adsorbing nutrients and other pollutants than impervious paved surfaces interspersed with patches of non-native turf grasses. Therefore, removal of forest cover will almost certainly increase pollutant loading into the Nanticoke watershed and make it more difficult for Delaware to comply with TMDL nutrient load reduction requirements.**

To ensure that the desired reductions are consistent with said TMDL, the nutrient budget should employ relevant scientifically defensible assumptions from peer-reviewed research conducted in a geologic setting similar to that of the coastal plain of Delaware. **Such a model is currently being developed by the Department. The developer/consultant should contact Lyle Jones in the Department's Watershed Assessment Section for further information regarding the acceptable protocol for calculating a nutrient budget.**

### **Water Supply**

The information provided indicates that the Town of Georgetown will provide water to the proposed projects through a central public water system. If this parcel is annexed, as proposed, the Town of Georgetown will need to send notification to the Public Service Commission so that their CPCN can be extended. If it is not annexed, the water provider will need to file an application for a CPCN with the Public Service Commission. Information on CPCN requirements and applications can be obtained by contacting the Public Service Commission at 302-739-4247.

Should dewatering points be needed during any phase of construction, a dewatering well construction permit must be obtained from the Water Supply Section prior to construction of the well points. In addition, a water allocation permit will be needed if the pumping rate will exceed 50,000 gallons per day at any time during operation.

All well permit applications must be prepared and signed by licensed water well contractors, and only licensed well drillers may construct the wells. Please factor in the

necessary time for processing the well permit applications into the construction schedule. Dewatering well permit applications typically take approximately four weeks to process, which allows the necessary time for technical review and advertising.

Should you have any questions concerning these comments, please contact Rick Rios at 302-739-3665.

### **Stormwater Management**

Review and approval of the sediment and stormwater plan for this project will be handled by Sussex Conservation District. Contact Jessica Watson, Program Manager, at (302) 856-7219 to schedule a pre-application meeting as soon as possible.

### **Forests**

Large forest blocks such as those on-site provide habitat for other wildlife and provide important water quality benefits. The developer is strongly encouraged to preserve, and where possible, enhance forested resources on site. Any lands set aside for conservation purposes should be placed into a permanent conservation easement or other binding protection mechanism. These areas should be clearly marked and delineated so that residents understand their importance and so that homeowner activities do not infringe upon these areas.

Based on review of topographic maps and aerial photographs, and because we have not visited the site previously, it is requested the Natural Heritage be given the opportunity to survey the wetland and forested resources on the project parcel (s). These observations will allow them to make more informed comments on the project. Please contact the DNHESP (302) 653-2880 to set up a site visit.

### **Open Space**

To maximize the existing buffering capacity and wildlife habitat on site, it is recommended that lot lines and other infrastructure (such as stormwater management ponds) be pulled out of the forest and areas of community open space be designated along the forested areas. Doing so will accomplish two things: it will preserve the existing riparian buffers on site and its value for birds and wildlife and it will create recreational opportunities for residents by allowing them access to and views of the forest and stream.

In areas set aside for passive open space, the developer is encouraged to consider establishment of additional forested areas or meadow-type grasses. Once established, these ecosystems provide increased water infiltration into groundwater, decreased run-off into surface water, air quality improvements, and require much less maintenance than traditional turf grass, an important consideration if a homeowners association will take over responsibility for maintenance of community open spaces.

Open space containing forest and/or wetlands should be placed into a permanent conservation easement or other permanent protection mechanism. Conservation areas should also be demarked to avoid infringement by homeowners.

## **Recreation**

It is recommended that sidewalks be built fronting every residence and stub streets. A complete system of sidewalks will: 1) fulfill the recreation need for walking and biking facilities 2) provide opportunities for neighbors to interact in the community and 3) facilitate safe, convenient off-road access to neighboring communities, public mass transit stops, schools, stores, work etc. It is also recommended that the two proposed cul-de-sacs be changed to stub streets providing connections to future development.

If a trail system is planned, DNREC recommends that a series of stacking trail loops be designed with access points in each subdivision “pod” and connections to adjacent communities. Community trail systems with long continuous trails, perimeter-only trails, and systems with few access points, often go unused and neglected. For trail design/construction specifications, contact Susan Moerschel at (302) 739-5285.

The Division of Parks and Recreation conducted a telephone survey of Delaware residents to gather information on outdoor recreation patterns and preferences as well as other information on their landscape perception. These findings are the foundation of the 2003-2008 Statewide Comprehensive Outdoor Recreation Plan (SCORP) providing guidance for investments in needed outdoor recreation facilities. The high and moderate facility needs in Western Sussex County are listed below. Consideration should be given to incorporate some of these recreation opportunities into the project.

### High Priorities

Walking or Jogging Paths

Picnic Areas

Bike Paths

Fishing Areas

### Moderate Priorities

Swimming Pools

Baseball/Softball Fields

Hiking Trails

Basketball Courts

Campgrounds

Playgrounds

## **Air Quality**



***Note: Comments for the air emission impacts of the 332 residential units***

Air pollution threatens the health of human beings and other living things on our planet. While often invisible, pollutants in the air create smog and acid rain, cause cancer or other serious health effects, diminish the protective ozone layer in the upper atmosphere, and contribute to the potential for world climate change. Breathing polluted air can have numerous effects on human health, including respiratory problems, hospitalization for heart or lung disease, and even premature death. Some can also have effects on aquatic life, vegetation, and animals.

Once complete, vehicle emissions associated with this project will be 25.5 tons (50,958.5 pounds) per year of VOC (volatile organic compounds), 21.1 tons (42,190.2 pounds) per year of NO<sub>x</sub> (nitrogen oxides), 15.6 tons (31,128.7 pounds) per year of SO<sub>2</sub> (sulfur dioxide), 1.4 ton (2,771 pounds) per year of fine particulates and 2,131.3 tons (~ 4.3 million pounds) per year of CO<sub>2</sub> (carbon dioxide)

Emissions from electrical power generation associated with this project will be 4.1 tons (8,146.1 pounds) per year of NO<sub>x</sub> (nitrogen oxides), 14.2 tons (28,334.2 pounds) per year of SO<sub>2</sub> (sulfur dioxide) and 2,089.6 tons (~ 4.2 million pounds) per year of CO<sub>2</sub> (carbon dioxide).

Emissions from area sources\* associated with this project will be 10.3 tons (20,553.9 pounds) per year of VOC (volatile organic compounds), 1.1 tons (2,261.6 pounds) per year of NO<sub>x</sub> (nitrogen oxides), 0.9 ton (1,876.8 pounds) per year of SO<sub>2</sub> (sulfur dioxide), 1.2 tons (2,421.9 pounds) per year of fine particulates and 41.7 tons (83,320.9 pounds) per year of CO<sub>2</sub> (carbon dioxide)

	VOC	NO <sub>x</sub>	SO <sub>2</sub>	PM <sub>2.5</sub>	CO <sub>2</sub>
Mobile	25.5	21.1	15.6	1.4	2131.3
Residential	10.3	1.1	0.9	1.2	41.7
Electrical Power		4.1	14.2		2089.6
TOTAL	35.8	26.3	30.7	2.6	4262.6

The Department of Natural Resources and Environmental Control is asking that local jurisdictions consider mitigation to help resolve this issue. Mitigation might involve limiting large new developments to growth zones, focusing development to urban areas capable of providing mass transit services, requiring more energy efficient homes which would lessen air quality impacts, and promoting walkability and bikability within and between developments and town centers.

With that said this State notes that this proposed development is within a growth area and proposed for annexation within the Town of Georgetown. Therefore, the State would ask

that you consider the development of energy efficient homes and interconnectivity with the Town and surrounding commercial areas to promote walkability and bikeability.

### **Underground Storage Tanks**

There are four inactive and 3 active LUST sites located near the proposed project:

Georgetown Dash-In Facility # 5-000496, Project # S9611195

Georgetown Exxon Facility # 5-000268, Project # S9608143

Jeff Whits Quality Auto, Facility # 5-000728, Project # S9304070

R E Blakely & Son, Facility # 5-000158, Project # S9404077

Georgetown Dash-In Facility # 5-000496, Project # S0307041

R E Blakely & Son, Facility # 5-000158, Project # S0001012

Discount Gas, Facility # 5-000162, Project # S9106113

No environmental impact is expected from the above inactive/active LUST site(s). However, should any underground storage tank or petroleum contaminated soil be discovered during construction, the Tank Management Branch must be notified as soon as possible. It is not anticipated that any construction specifications would be need to be changed due to petroleum contamination. However, should any unanticipated contamination be encountered and PVC pipe is being utilized, it will need to be changed to ductile steel in the contaminated areas.

### **State Fire Marshal's Office – Contact: Duane Fox 856-5298**

These comments are intended for informational use only and do not constitute any type of approval from the Delaware State Fire Marshal's Office. At the time of formal submittal, the applicant shall provide; completed application, fee, and three sets of plans depicting the following in accordance with the Delaware State Fire Prevention Regulation (DSFPR):

a. **Fire Protection Water Requirements:**

- Water distribution system capable of delivering at least 1500 gpm for 2-hour duration, at 20-psi residual pressure is required. Fire hydrants with 800 feet spacing on centers. (Mercantile)
- Water distribution system capable of delivering at least 1000 gpm for 1-hour duration, at 20-psi residual pressure is required. Fire hydrants with 800 feet spacing on centers. (Assembly, Apartment and Townhouses)
- Where a water distribution system is proposed for single family dwellings it shall be capable of delivering at least 500 gpm for 1-hour duration, at 20-psi residual pressure. Fire hydrants with 1000 feet spacing on centers are required. (One & Two- Family Dwelling)
- Where a water distribution system is proposed for the site, the infrastructure for fire protection water shall be provided, including the size of water mains for fire hydrants and sprinkler systems.

b. **Fire Protection Features:**

- All structures over 10,000 Sq. Ft. aggregate will require automatic sprinkler protection installed.
- Buildings greater than 10,000 sq.ft., 3-stories of more or over 35 feet, or classified as High Hazard, are required to meet fire lane marking requirements.
- Show Fire Department Connection location (Must be within 300 feet of fire hydrant), and detail as shown in the DSFPR.
- Show Fire Lanes and Sign Detail as shown in DSFPR
- For townhouse buildings, provide a section / detail and the UL design number of the 2-hour fire rated separation wall on the Site plan.

c. **Accessibility**

- All premises which the fire department may be called upon to protect in case of fire, and which are not readily accessible from public roads, shall be provided with suitable gates and access roads, and fire lanes so that all buildings on the premises are accessible to fire apparatus. This means that the access road to the subdivision from US Route 113 must be constructed so fire department apparatus may negotiate it.
- Fire department access shall be provided in such a manner so that fire apparatus will be able to locate within 100 ft. of the front door.
- Any dead end road more than 300 feet in length shall be provided with a turn-around or cul-de-sac arranged such that fire apparatus will be able to turn around by making not more than one backing maneuver. The minimum paved radius of the cul-de-sac shall be 38 feet. The dimensions of the cul-de-sac or turn-around shall be shown on the final plans. Also, please be advised that parking is prohibited in the cul-de-sac or turn around.
- If the use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.

d. **Gas Piping and System Information:**

- Provide type of fuel proposed, and show locations of bulk containers on plan.

e. **Required Notes:**

- Provide a note on the final plans submitted for review to read “ All fire lanes, fire hydrants, and fire department connections shall be marked in accordance with the Delaware State Fire Prevention Regulations”
- Proposed Use
- Alpha or Numerical Labels for each building/unit for sites with multiple buildings/units
- Square footage of each structure (Total of all Floors)
- National Fire Protection Association (NFPA) Construction Type

- Maximum Height of Buildings (including number of stories)
- Townhouse 2-hr separation wall details shall be shown on site plans
- Note indicating if building is to be sprinklered
- Name of Water Provider
- Letter from Water Provider approving the system layout
- Provide Lock Box Note (as detailed in DSFPR) if Building is to be sprinklered
- Provide Road Names, even for County Roads

Preliminary meetings with fire protection specialists are encouraged prior to formal submittal. Please call for appointment. Applications and brochures can be downloaded from our website: [www.delawarestatefiremarshal.com](http://www.delawarestatefiremarshal.com), technical services link, plan review, applications or brochures.

**Department of Agriculture - Contact: Mark Davis 739-4811**

A forested buffer is required between the proposed subdivision and all adjacent properties in active agricultural use. In addition, a forest buffer should be maintained for those pre-existing residential properties and along all streams, wetlands, and river that border the proposed subdivision.

The developer should consider a diverse landscape plan that uses Delaware native tree and shrub species and encourages the “Right Tree for the Right Place” concept.

**Public Service Commission - Contact: Michael Malak 739-4247**

As noted before, the Town of Georgetown must notify the Public Service Commission once annexation is completed.

Any expansion of natural gas or installation of a closed propane system must fall within Pipeline Safety guidelines.

**Delaware State Housing Authority – Contact Karen Horton 739-4263**

The State Housing Authority supports the density, the mix of condominium and town house units, and the close proximity to services and markets. However, according to the applicant, the condominium units will start at \$130,000 – which appears high for the market that high-density units, such as these, typically serve. DSHA encourages the applicant to consider including prices that are affordable to moderate-income households as well. The provision of these units will help address the need for affordable homeownership that was identified in the 2003 Statewide Housing Needs Assessment.

**Department of Education – Contact: Nick Vacirca 739-4658**

332 Single family units could generate and estimated 166 additional students to the Indian River School District.

Sussex County does not have school concurrence legislation at this time. We recommend that the developer submit a package to the school district for informational purposes.

If the development is approved and build, please use the following information for school transportation planning. If there are homes more than 1/2 mile from the nearest public road (outside the development), developers should plan wide enough streets so that large school buses can access and turn around (without backing) from the furthest areas within the development while picking up and dropping off students. Should there not be any sites more than 1/2 mile from the nearest public road, provisions for appropriate pick-up and drop-off at the development entrance should be included. The developer should work closely with the school district transportation supervisor.

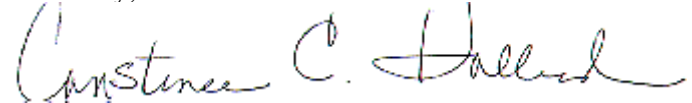
**Delaware Emergency Management Agency – Contact: Don Knox 659-3362**

A significant impact to public safety is foreseen by implementation of this project. The developer should notify the police, fire service, and emergency medical response organization serving the town of Georgetown and Sussex County, to keep them apprised of all development activities. Routes 113 and 18 are both coastal storm evacuation routes and this development will add to the traffic volume on these routes during a coastal storm event.

**Following receipt of this letter and before the site plan is approved by the Town of Georgetown, the applicant shall provide to the local jurisdiction and the Office of State Planning Coordination a written response to comments received as a result of the pre-application process, noting whether comments were incorporated into the project design or not and the reason therefore.**

Thank you for the opportunity to review this project. If you have any questions, please contact me at 302-739-3090.

Sincerely,

A handwritten signature in dark ink, appearing to read "Constance C. Holland". The signature is fluid and cursive, with the first name "Constance" being the most prominent part.

Constance C. Holland, AICP  
Director

CC: Debbie Pfeil, Town of Georgetown.  
Richard Kautz, Sussex County